

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:
JASON TAYLOR MARTIN,
Debtor.

NATHAN PARK,
Plaintiff,

VS.

JASON TAYLOR MARTIN,
Defendant.

CASE NO. 22-42492-elm7
CHAPTER 7

Adversary No. 23-04001-elm

JOINT PRE-TRIAL ORDER

Pursuant to Local District Rule 16.4, and this Court's Scheduling Order, Nathan Park and Jason Taylor Martin, hereby submit their proposed Joint Pre-Trial Order:

I.

Summary of Claims and Defenses

A. Plaintiff's Claims

On or about October 10, 2021, Jason Martin initiated a telephone call to Marcus Powell, who is a retired United States Marine Corp member and owner of Powell Roofing and Construction, and who knows Nathan Park and does business with him. In the phone call, which

was also heard by Mr. Powell's wife, Kalyn Powell, Martin stated that Park (1) was a murderer; (2) had placed a hit to kill Martin; (3) had killed Park's father-in-law; (4) had caused the murder of several other individuals; and (5) had caused the murders for financial benefit.

Park resides with his family in Hunt County for years and has been active in the community as well as the business community. He has enjoyed a reputation for high character and the fine behavior.

As a result of the oral defamatory statements, Park's reputation has been injured. The defamatory statements have caused Park to suffer mental anguish, public humiliation, and embarrassment. Park seeks his damages, including exemplary damages as the statements were willful and malicious.

Pursuant to the provisions of 11 U.S.C. §523(a)(6), Park seeks a determination from the Court that the indebtedness of Martin to Park is not dischargeable because it arose as a result of willful and malicious injury caused by Martin to Park.

Park is not pursuing his claims previously plead pursuant to 11 U.S.C. § 727(a)(2)(A) and 11 U.S.C. § 727(a)(5).

B. Defendant's Position

Defendant provided the attached document to be included.

II.

Contested Issues of Fact

1. Whether Jason Martin initiated a telephone call to Marcus Powell, and stated that Mr. Park (1) was a murderer; (2) had placed a hit to kill Martin; (3) had killed Mr. Park's father-in-law; (4) had caused the murder of several other individuals; and (5) had caused the murders for financial benefit.

2. Whether such statements were for willful and malicious injury to Nathan Park.
3. Whether and what damages Nathan Park suffered as a result of the defamatory statements.

III.

Contested Issues of Law

Whether Martin's actions as to Park were willful and malicious and with intent to and in fact, caused injury to Park.

IV.

Estimated Length of Trial

Three hours.

V.

Additional Matters

Park served a Request for Production of Documents to Martin. Martin did not respond to the Request. As to any matters on which Martin did not produce responsive documents, Park will object to Martin providing testimony.

/s/ Scott E. Hayes

Scott E. Hayes SBN: 09280050

shayes@wslawpc.com

Richard G. Dafoe SBN: 05309500

rdafoe@wslawpc.com

WADDELL SERAFINO GEARY RECHNER JENEVEIN, P.C.

1717 Main Street | 25th Floor

Dallas, TX 75201

Telephone: (214) 979-7400

Facsimile: (214) 979-7402

ATTORNEYS FOR PLAINTIFF NATHAN PARK

Jason Taylor Martin, Pro Se

“MARTIN ADDITION”

8:38



Kalyn Jones

Active 27m ago



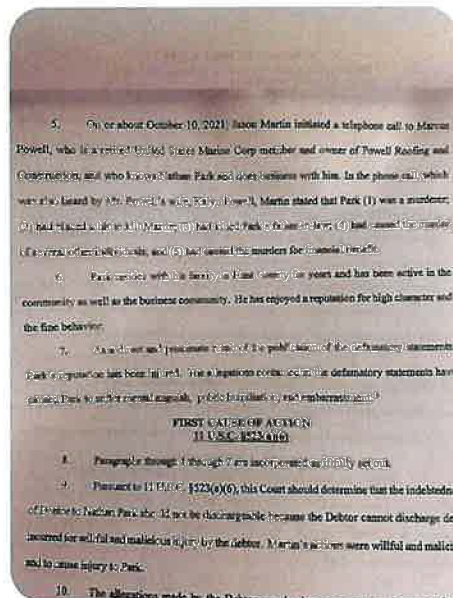
Marcus left me in the farm about everything.



OCT 20, 2022 AT 3:12 PM

Sounds about right

JAN 17 AT 6:14 PM



Your in this federal law suit FYI

Wtf....



Who did that come from?

I heard Marcus is being investigated for his disability because he has his "roofing" company has been on roofs



Aa

